

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE TO
AMERICAN POSTAL WORKERS UNION WITNESS KATHRYN KOBE
(USPS/APWU-RT1-1 TO 6)

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the United States Postal Service submits the following interrogatories to American Postal Workers Union Witness Kathryn Kobe (APWU-RT-1).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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USPS/APWU-RT1-1. On page 8, line 11, of your testimony, you refer to the “Processing Facility ‘Fact Sheet’” as the source for your statement that the Postal Service reduced the number of processing facilities by 23 percent between 2009 and 2011.

- (A) Please confirm that, according to the referenced Fact Sheet, most of the 23 percent change resulted from a reduction in the number of Customer Service Facilities. If you do not confirm, please explain.
- (B) Please confirm that, according to the referenced Fact Sheet, the reduction in the number of Processing & Distribution Centers between 2009 and 2011 was between 6 and 7 percent. If you do not confirm, please explain.

USPS/APWU-RT1-2. In Table 1 of your testimony, at page 9, you list facilities which you believe should not be included in determining the savings from Network Rationalization, due to their consolidations.

- (A) Please confirm that the workhours associated with the listed facilities that are not saved due to these consolidations should be included in determining the savings. If you do not confirm, please explain.
- (B) Should Table 1 be revised to list only those work hours that have been saved under the approved consolidations? If not, please explain why not.

USPS/APWU-RT1-3. Please refer to Table 2 of your testimony, at page 11. In light of the supplemental testimonies filed by Postal Service witnesses, is the issue you raise in connection with Table 2 now moot? If not, please explain why not.

USPS/APWU-RT1-4. Please refer to Table 4 of your testimony, at page 15.

- (A) Please provide a spreadsheet showing the underlying calculations, with specific page and line number references to the National Payroll Summary Hours report.
- (B) Were the underlying calculations performed using PP06, FY2012?
- (C) Were the wages used in the underlying calculations PP06 or YTD?
- (D) Did the calculations of weighted averages costs in the column “Weighted Average” include all clerks or only Full Time and PSE clerks?
- (E) How do the caps consider PTFs and other categories of clerks?

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USPS/APWU-RT1-5. At pages 18-19 of your testimony, you state: "For example, the PSEs do not have to be called in to work at all. If PSEs are called in, it can be for as little as two hours. If, as the DPS activity winds down on a tour, there is not enough work for all the workers, the PSEs can be sent home early."

- (A) Do you believe that such utilization of employees is realistic and practicable across the Postal Service's mail processing network?
- (B) Do you believe that, if the Postal Service attempted to use employees in this fashion across its mail processing network, it would be able to retain a sufficiently large enough proportion of the affected employees to maintain a stable, experienced processing workforce.

USPS/APWU-RT1-6. At pages 23-25 of your testimony, you explain why, in your view, Postal Service witness Smith's calculation of a factor for additional service-wide costs is overstated. Specifically, you state that some of the components in the service-wide costs calculation declined from FY 2010 to FY 2011.

- (A) In concluding that witness Smith's calculation is overstated, did you consider the change in total salary and benefits from FY 2010 to FY 2011?
- (B) Do you believe that the total salary and benefits declined from FY 2010 to FY 2011?
- (C) Do the cited declines in some components of service-wide benefits costs necessarily imply whether or not the service-wide benefits per \$1,000 of salary and benefits (\$111.54 in FY2010) declined in FY2011?